

FILED

FEB 8 2016

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

Phil Lombardi, Clerk  
U.S. DISTRICT COURT

Brenita Combs

Plaintiff(s)

vs.

Internal Revenue Service

Defendant(s)

Case Number: **16 CV - 75 JED - PJC**

COMPLAINT - EEOC

Comes now the Plaintiff, Brenita Combs and for his/her  
claim against the Defendant(s), Internal Revenue Service  
states and alleges as follows:

1. This action is brought and jurisdiction lies pursuant to 42 U.S.C. §2000e-5. Venue is proper in this District.

2. Plaintiff is a(n) Black American Indian FM who resides at  
(Race) (Sex)

1441 E 62nd St. Apt. J Tulsa Oklahoma 74136  
(Complete address)

3. The Defendant \_\_\_\_\_ is an employer,  
employment agency, or labor organization, as defined in 42 U.S.C. §2000e, and is located at  
\_\_\_\_\_

(Note: 3a-3f to be used if there is more than one defendant.)

3a. The Defendant \_\_\_\_\_ is an employer,  
employment agency, or labor organization, as defined in 42 U.S.C. §2000e, and is located at  
\_\_\_\_\_

3b. The Defendant \_\_\_\_\_ is an employer,  
employment agency, or labor organization, as defined in 42 U.S.C. §2000e, and is located at  
\_\_\_\_\_

3c. The Defendant \_\_\_\_\_ is an employer,  
employment agency, or labor organization, as defined in 42 U.S.C. §2000e, and is located at  
\_\_\_\_\_

3d. The Defendant \_\_\_\_\_ is an employer,  
employment agency, or labor organization, as defined in 42 U.S.C. §2000e, and is located at  
\_\_\_\_\_

Complaint

1

3e. The Defendant \_\_\_\_\_ is an employer, employment agency, or labor organization, as defined in 42 U.S.C. §2000e, and is located at \_\_\_\_\_

3f. The Defendant \_\_\_\_\_ is an employer, employment agency, or labor organization, as defined in 42 U.S.C. §2000e, and is located at \_\_\_\_\_

4. On or about 07/31, 2014, defendant(s)  
(Month/day) (Year)

(Specify the unlawful employment practices which you are alleging against the defendant(s), such as: refusal to hire, discharge from employment, harassment in employment, etc.)

Constructive termination, harassment, disparate treatment by upper management. Have dept manager on tape admitting to harassment and also received unemployment because of medical condition caused by dept of Treasury Internal Revenue Service.  
because of (state why defendant(s) discriminated against you, i.e. race, color religion, sex or national origin, etc.)

Race, age, Retaliation/Reprisal Prior EEO (2006)

5. Plaintiff timely filed a written complaint of discrimination with the Equal Employment Opportunity Commission (EEOC) and received a right to sue letter, a copy of which is attached. All conditions precedent to the institution of this lawsuit have been fulfilled. Denied right to sue letter from EEOC.

Wherefore, Plaintiff prays for (state what relief is sought) I am requesting the maximum amount of \$300,000 for punitive damages, emotional pain, suffering, mental anguish, loss of enjoyment of life, constructive termination.

and such other relief as the Court would allow under Title VII of the Civil Rights Act of 1964.

Signature

Address

City

State

ZIP

Telephone

Brenita Combs

1441 E 62nd St. Apt J

Tulsa

OK

74136

918-810-8446

Copy

From: Brenita Combs

EBDC Docket NO. 560-2015-00193X  
Agency NO. IRS-14-0488-F

TO:

Diane R. Stallard  
Senior Attorney  
General Legal Services  
IRS Office of Chief Counsel

Fax 469-801-1050



(Copy) (2)

Brenita Combs  
~~Sept.~~ 9, 2015

Re: Brenita Combs v. Department of Treasury  
EEOC Docket NO. 560-2015-00193X  
Agency NO. IRS-14-00488F

I Brenita Combs am responding  
to the letter I received Aug 25, 2015  
Agency's Interrogatories, Request For Admission  
and Requests For Production of Documents  
to complaint.

Per letter received after the conference  
call with Judge Tatjana Schwendinger and  
Diane Stallard on July 24, 2015. Per  
conversation Diane Stallard ~~eg~~ mention to  
judge that we needed Discovery. The  
deadline date for discovery was due on  
aug 21, 2015, when I didn't receive  
anything from Diane Stallard I called  
her on August 09, 2015 and August 10, 2015  
to let her know that I had not received  
anything. I also have faxed on several  
occasions a settlement judgement  
and it has been ignored.

(3) Brenita Combs  
(COPY) EDC Docket No. 560-2015-00193X  
continued Agency NO. IRS 14-00488 F

I then faxed Diane Stallard and the judge  
on my letter Kendra R. Howard 132 pages  
of documents.

- (A) Copies of medical letter from my doctor.
- (B) Settlement Summary Judgment
- (C) Letter from Unemployment to show appeals was won and the outcome.
- (D) Medical excuses from my doctor.
- (E) E-mail that I emailed to Commissioner Koskijenen to ask for help stopping the harassment.
- (F) E-mail to Director Beverly Thomas letting her know about being bullied and harassment.



(COPY) (4) Brenita Combs  
EEOC Docket No. 560-2015-00193X  
Agency NO. IRS 14-00488F

(G) memo put in my file written by operations manager Kelly Taylor to use against me and deny me sick leave, which per NTEU contract was illegal to do.

(H) More memo's, AWR's, grievances to show harassment. Some of grievance's dates were changed by agency. Evaluation which refuse to change to correct one.

(I) I have had the judges changed

(J) I would like to know who is the judge that is handling this case because I have sent my information to Judge Kendra R. Howard and also Judge Tatjana Schwendinger and Diane Stallard Esq for IRS attorney.

(K) I understand that Diane Stallard Esq was also the attorney for my MSPB case, not quite understanding why?

added Can you please explain?

(L) Copy from my therapist.

(5) Brenita Combs  
COPY EDC Docket NO. 560-2015-0193X  
Agency NO. FRS14-00488F

I would like to do a  
settlement agreement or  
send me my right to sue  
letter).

Sincerely Brenita  
Combs

Sept. 9, 2015

PS I have unsworn declaration  
no signatures on letters, which should  
be legal and binding documents.  
I have the original tape and will be  
keeping it we have to have a hearing.  
I would like some all of things I sent to be  
addressed. (COPY)



B. Combs  
1441 E 62nd St. Apt. J  
Tulsa OK 74136

**RECEIVED**

FEB - 8 2016

Phil Lombardi, Clerk  
U.S. DISTRICT COURT



no postmark - 2

United States District Court  
333 W. 4<sup>th</sup> St. Room 411  
Tulsa Oklahoma

7410363661 0006

74103  
7410363661 0006